UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF

SEP 2 1 2016

CERTIFIED MAIL 7009 1680 0000 7647 3545
RETURN RECEIPT REQUESTED

Mr. Craig Stevens
Quality Manager
Cadillac Plating Corporation
23849 Groesbeck Highway
Warren, Michigan 48089

Re: Notice of Violation
Compliance Evaluation Inspection
MID006004451

Dear Mr. Stevens:

On November 18, 2015, a representative of the U.S. Environmental Protection Agency inspected Cadillac Plating Corporation (Cadillac Plating) facility located in Warren, Michigan. As a conditionally exempt small quantity generator of hazardous waste, Cadillac Plating is subject to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 *et seq*. (RCRA). The purpose of the inspection was to evaluate Cadillac Plating's compliance with certain provisions of RCRA and its implementing regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by Cadillac Plating, EPA's review of records pertaining to Cadillac Plating, and the inspector's observations, EPA has determined that Cadillac Plating violated RCRA requirements related to used oil labeling as described in the paragraph below.

Cadillac Plating violated the following generator requirement:

Used Oil Container Labeling

Under Mich. Admin. Code. r. 299.9810(3) [40 C.F.R. § 279.22(c)(1)], containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words "Used Oil."

During the inspection of the Oil Storage Area, there was one 55-gallon drum adjacent to the Oil Storage Area. The drum contained used oil cleaner (skimmed off of cleaner tanks) as stated by Mr. Ahmed. The drum was not labeled as "Used Oil."

According to Section 3008(a) of RCRA, EPA may issue an order assessing a civil penalty for any past or current violation, requiring compliance immediately or within a specified time period, or both. Although this letter is not such an order or a request for information under Section 3007 of RCRA, 42 U.S.C. § 6927, we request that you submit a response in writing to us no later than 30 days after receipt of this letter documenting the actions, if any, which you have taken since the inspection to establish compliance with the above-mentioned used oil requirement. You should submit your response to Bryan Gangwisch, U.S. EPA, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

This letter does not limit the applicability of the requirements evaluated, or of other federal or state statutes or regulations.

If you have any questions regarding this letter, please contact Mr. Gangwisch, of my staff, at (312) 886-0989 or at gangwisch.bryan@epa.gov.

Sincerely,

Gary J. Victorine, Chief
RCRA Branch

Enclosure

cc: Tracy Kecskemeti, MDEQ – Southeast Michigan District Office
kecskemetit@michigan.gov

John Craig, MDEQ – Lansing HQ Office
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5, LCD, RCRA BRANCH, LR-8J
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

SITE NAME: Cadillac Plating Corporation

EPA ID No.: MID006004451

ADDRESS: 23849 Groesbeck Highway
Warren, MI 48089

DATE OF INSPECTION: November 18, 2015

EPA INSPECTOR: Bryan Gangwisch

PREPARED BY: Bryan Gangwisch
Environmental Scientist
Compliance Section #2

12/9/15
Date Completed

APPROVED BY: Julie Morris, Chief
Compliance Section #2

12/15/15
Date

Purpose of Inspection
This inspection was an evaluation of Cadillac Plating Corporation (Cadillac Plating), and its compliance with hazardous waste regulations found at Michigan Administrative Code (MAC) and the Code of Federal Regulations (CFR). The inspection was a Federal lead RCRA Compliance Evaluation Inspection (CEI).

Participants

Mahmood Ahmed, Vice President	Cadillac Plating
Craig Stevens, Quality Assurance Engineer	Cadillac Plating
Bryan Gangwisch, Environmental Scientist	U.S. EPA

Introduction
I arrived at the site on November 18, 2015, at approximately 9:45 a.m. The weather consisted of cloudy conditions with moderate wind, and an ambient air temperature of approximately 55 degrees Fahrenheit. I asked for listed contact Mahmood Ahmed from the reception area. As Mr. Ahmed arrived, I introduced myself, presented my inspector credentials, and described the purpose of the inspection and the process by which I intended to conduct the inspection. I was led to Mr. Ahmed's office. Mr. Ahmed provided me with a verbal description of the site, led the tour throughout the facility, and then Mr. Stevens and Mr. Ahmed attempted to provide me with the records I requested for review.

Site Description
During the opening conference Mr. Ahmed stated all of the following unless otherwise noted: The facility conducts electroplating operations on steel parts. Cadillac Plating had seven zinc plating lines. The facility operated three zinc and iron electroplating lines, and three pure zinc electroplating lines. All six of the lines utilize trivalent chromium. There was one other zinc electroplating line, that utilizes hexavalent chromium, that operates about once per week. There are approximately 40 employees at this facility that work three shifts typically Monday through Friday. Maintenance operations are typically conducted on the weekends.

The electroplating operations were comprised of the following baths: soak tank (strong soap utilized for removal of oil/grease), rinse tank, electrocleaner (alkaline soap utilized with electrocurrent), rinse tank, mild hydrochloric acid (removes oxide), rinse tank, electroplating (zinc) tank, rinse tank (zinc plating complete at this stage), chrome tank (trivalent chrome –forms zinc chromate), rinse tank, dryer, and then parts are packaged for shipping. All of the rinses (acid rinse, trivalent chrome rinse, plating rinse, and cleaner rinse) and overflow go to the waste water treatment portion of the facility. The waste water treatment system is an automatic batch treatment system that included dedicated tanks for pH treatment, precipitation (sludge settle down), the clarifier, filters, and then the filter press. The treated water from the first half of the waste water treatment system is piped to the Clarifier Room. A flocculent is added to the waste

water to precipitate out a sludge. The water overflow goes to the filters for sample and discharge to the city sewer. The City of Warren conducts sampling every two months. Three tanks are utilized in the Clarifier room. One of the tanks contains a caustic cleaner waste water. Another tank contains hydrochloric acid cleaner waste water. A third tank contains a combination of the two waste waters. The waste water from the caustic and acid tanks are batch treated (neutralized) and pumped into the third tank. Sludge from the third tank is then pumped to the filter press.

The waste water treatment sludge (filter cake) generated at the facility had been determined to be non-hazardous waste as stated by Mr. Ahmed, and has been, and is currently, being shipped on a non-hazardous special waste manifest. The waste water treatment filter cake has been, and is currently, being shipped to Sauk Trail landfill in Canton, Michigan, which is a non-hazardous waste landfill. Per the RCRAInfo database, Cadillac Plating stopped managing their generated waste water treatment filter cake as F006 since 2009.

Cadillac Plating had a 2013 hazardous waste shipment of D007 (chromium) that was sent to EQ Detroit, Inc. At the time of the inspection I asked Mr. Ahmed what that waste shipment was comprised of, and Mr. Ahmed stated that the shipment was chromium solution discarded due to no more utilization of the solution. However, the description on the manifest indicated that the shipment of chromium solids (30 yards) was waste water treatment filter cake.

Cadillac Plating was operating as a conditionally exempt small quantity generator at the time of the inspection according to facility personnel and the facility's determination of their waste generation rate. Pending documentation from the facility supporting their determination of their waste water treatment filter cake no longer meeting the F006 listing description, the facility would still be operating as a large quantity generator based upon their waste water treatment filter cake generation rate. There was one waste container storage area observed at the facility at the time of the inspection.

The main waste streams that are regularly generated at Cadillac Plating consist of: waste water treatment sludge filter cake, and separated water (from oil/water separator - shipped as 029L). The hazardous waste codes associated with the main hazardous waste types that are generated at Cadillac Plating consist of: F006. There is an oil/water separator at the facility. There were two tanks utilized for used oil storage. The facility's used oil (skimmed used oil and hydraulic used oil combined together for shipment as stated by Mr. Stevens) is picked up by Future Environmental, Inc. (ILD984831396), and is sent to Future Environmental, Inc. (MIK184878882), for recycling. There were universal waste bulbs observed. The facility's spent fluorescent bulbs are shipped to Lampmaster Recycling Services, LLC (Cincinnati, Ohio) for recycling (most recent shipment was 8/24/15). The facility's fork lifts are serviced by an outside vendor. The facility did not generate spent universal waste batteries. There was no electronic waste observed during the inspection.

Site Tour

A physical walk-through of the facility was conducted at approximately 10:43 a.m. We started at the Lab. The chemicals, after testing, are placed back into the process baths for re-use as stated by Mr. Ahmed. There was no waste observed in this area at the time of the inspection.

Next, I inspected the Shipping area. There were finished parts in storage. There was no waste observed in this area at the time of the inspection.

At the Receiving area, there were parts in storage that were received to be plated. There was no waste observed in this area at the time of the inspection.

Next, I inspected the Oil Storage Area. There were two 1,000-gallon used oil tanks that were situated inside of a diked secondary containment area. Mr. Ahmed stated that it takes about one year for each tank to be filled completely. One of the tanks was labeled as "Used Oil Hydraulic." The other tank was labeled as "Used Oil Cleaner." There was one 55-gallon drum adjacent to the Oil Storage Area. The drum contained used oil cleaner (skimmed off of cleaner tanks) as stated by Mr. Ahmed. The drum was not labeled as "Used Oil." A picture was taken.

At Zinc Line # 7 (the facility's largest line), there was a safety shower in the area. There was no waste observed in this area at the time of the inspection.

Next, I inspected the Chemical Storage Area. All of the containers in this area contained product as stated by Mr. Ahmed. There was no waste observed in this area at the time of the inspection.

Outside of the facility, at the Carbonate Removal Area there were five open top tanks. All of the tanks were empty. The tanks are utilized one time per year to precipitate the carbonates out of the process bath solutions as stated by Mr. Ahmed. The solutions are then put back into the process baths as stated by Mr. Ahmed. The carbonate is then dissolved in water and treated in the waste water treatment system as stated by Mr. Ahmed. There were empty totes in the area. There was no waste observed in this area at the time of the inspection.

Outside of the facility, at the Product Hydrochloric Acid Tank area, there was one product acid tank that had a capacity of approximately 1,400-gallons as stated by Mr. Ahmed. The product tank was situated inside of a diked secondary containment.

Next, back inside of the facility, I inspected the Filter Press Area. The waste water treatment filter cake is collected in hoppers (approximately 100-gallons each) beneath the filter presses. Two of the hoppers contained filter cake. Mr. Ahmed stated that the hoppers are emptied into the 20 cubic-yard roll-off box about twice per week. The hoppers did not have any hazardous waste labels or applicable hazardous waste codes on them. There was filter cake observed on the ground adjacent to one of the hoppers. The area was equipped with a blind containment sump as stated by Mr. Ahmed. Pictures were taken.

Outside of the facility, at the Filter Cake Storage Area, there was one 20 cubic-yard roll-off box that contained waste water treatment filter cake. There was no hazardous waste label, applicable hazardous waste code, nor an accumulation start date marked on the roll-off box. There was a sign that read "Hazardous Waste" posted above the roll-off area. The roll-off box also was not covered at the time of the inspection. The two hoppers that contained waste water treatment filter cake were dumped into the roll-off during the inspection, but the roll-off was still not covered after the hoppers were dumped into it. Pictures were taken. There was a fire extinguisher, decontamination equipment, spill control equipment, and a phone in the vicinity. Aisle space was sufficient in this area.

Back inside of the facility, at the Waste Water Treatment Clarifier Room, I observed the discharge point to the city sewer. There was no waste observed in this area at the time of the inspection.

Next, I inspected the Waste Water Treatment Area. Mr. Ahmed stated that all of the incoming waste water overflow entering the waste water treatment system drains by gravity into the system. The waste water system is all automatically operated as stated by Mr. Ahmed. There was no waste observed in this area at the time of the inspection.

At the Used Electric Lamps Area, there was a wooden box hung on the wall that contained the spent fluorescent bulbs. The outer portion of the box was labeled as "Used Electric Lamps", was dated 7/28/15, and the box was closed. Mr. Ahmed stated that shop rags (no solvent use) are collected and are sent for laundering.

Record Review

The review of records was conducted. The recent manifests show that all hazardous waste was sent to the following TSDF: EQ Detroit, Inc. (MID980991566). The following transporter was also used: ERG Environmental Services (MID059912956). At least three years of manifests (one hazardous waste shipment of waste water treatment filter cake occurred on 1/29/13) were retained on-site. The LDR notice was available for review for the waste stream. There were no manifests utilized for hazardous waste shipments in 2012, 2014, and 2015. Cadillac Plating is, and has been since approximately 2009, sending its generated waste water treatment filter cake as a non-hazardous waste on non-hazardous special waste manifests. Since at least April 4, 2013, Cadillac Plating has been sending its waste water treatment filter cake to Sauk Trail Hills Development in Canton, Michigan (Subtitle D non-hazardous waste landfill). The transporter for these shipments (18 total up to the time of the inspection) was Environmental Recycling Group (Livonia, Michigan). I reviewed the non-hazardous special waste manifests from 2013 through 2015. There were four shipments in 2013, seven shipments in 2014, and seven shipments thus far in 2015. The most recent shipment of the facility's generated waste water treatment filter cake occurred on October 5, 2015.

I reviewed the facility's industrial pre-treatment waste water discharge permit from the City of Warren. The facility's permit number is 400703 as of May 28, 2014.

Cadillac Plating did not provide documentation that the hazardous waste biennial report for the year 2013 was submitted. Mr. Ahmed stated that the documentation for the biennial report for 2013, was forthcoming.

There were weekly inspections occurring and being documented for the Filter Cake Storage Area. Weekly documented inspection records were reviewed for years 2013, 2014, and 2015. The emergency equipment was also inspected and documented on the same weekly logs. Mr. Stevens conducts the inspections.

Waste determinations were documented through analysis. The analytical testing data/profile for the waste water treatment filter cake waste stream was reviewed. Midwest Analytical Services, Inc., performed (on 11/24/09) a TCLP analysis on the waste water treatment filter cake waste stream. Midwest Analytical Services, Inc., performed (on 10/13/09) a TCLP analysis on the waste water treatment filter cake waste stream. Trace Analytical Laboratories, Inc., performed (on 9/24/13) a TCLP analysis on the waste water treatment filter cake waste stream.

There was a contingency plan in place for the facility. The plan was titled "Hazardous Waste Contingency Plan for Cadillac Plating Corporation." The listed primary and alternate emergency coordinators were Mr. Ahmed. The listed alternate emergency coordinators were Nicola Salvati, Nick Salvati, Jr., and Craig Stevens. The plan was last updated on September 25, 2014. There was no documentation that indicated that any part of the updated portion of the plan was submitted to the local police and fire departments, the hospital, and state and local emergency response teams. There was documentation provided that indicated that the last time the contingency plan had been submitted to the required authorities (except for the police department) was in April 2003. Mr. Stevens stated that the plan had not changed since 2003. There had been no contingency plan implementation as stated by Mr. Ahmed.

There were no reported spills or fires related to hazardous waste as stated by Mr. Ahmed. The facility's fire extinguishers and safety showers are regularly inspected by Cintas as stated by Mr. Ahmed. The facility was equipped with a public address system as stated by Mr. Ahmed.

There was a RCRA hazardous waste management training program in place at the facility. There was documentation of an annual RCRA training via training summaries provided that documented that the RCRA trainings were being received by employees. The training summaries were reviewed for years 2013, 2014, and 2015. The training documents (names, titles, job descriptions, and type/amount of training) for employees in positions of hazardous waste management were documented. Mr. Stevens stated that he conducts the annual RCRA hazardous waste management training. There was no documentation of annual RCRA hazardous waste management training provided for the primary (Mr. Ahmed – 2013, 2014, 2015) and alternate emergency coordinators (Mr. Stevens - 2014, Nick Salvati, Jr., - 2014, Nicola Salvati – 2013, 2014, and 2015) at Cadillac Plating.

Closing Conference

I summarized the RCRA requirements for the following: documented hazardous waste training, contingency plan, hazardous waste container management, waste characterization (documentation of non-applicability for F006 listing), utilizing hazardous waste manifests and LDRs documenting all applicable waste codes, appropriate disposal destination for the filter cake, and biennial reports. The inspection concluded at approximately 2:00 p.m.

Cadillac Plating made no claim of confidential business information related to any information obtained, or any pictures taken by U.S. EPA during the inspection.

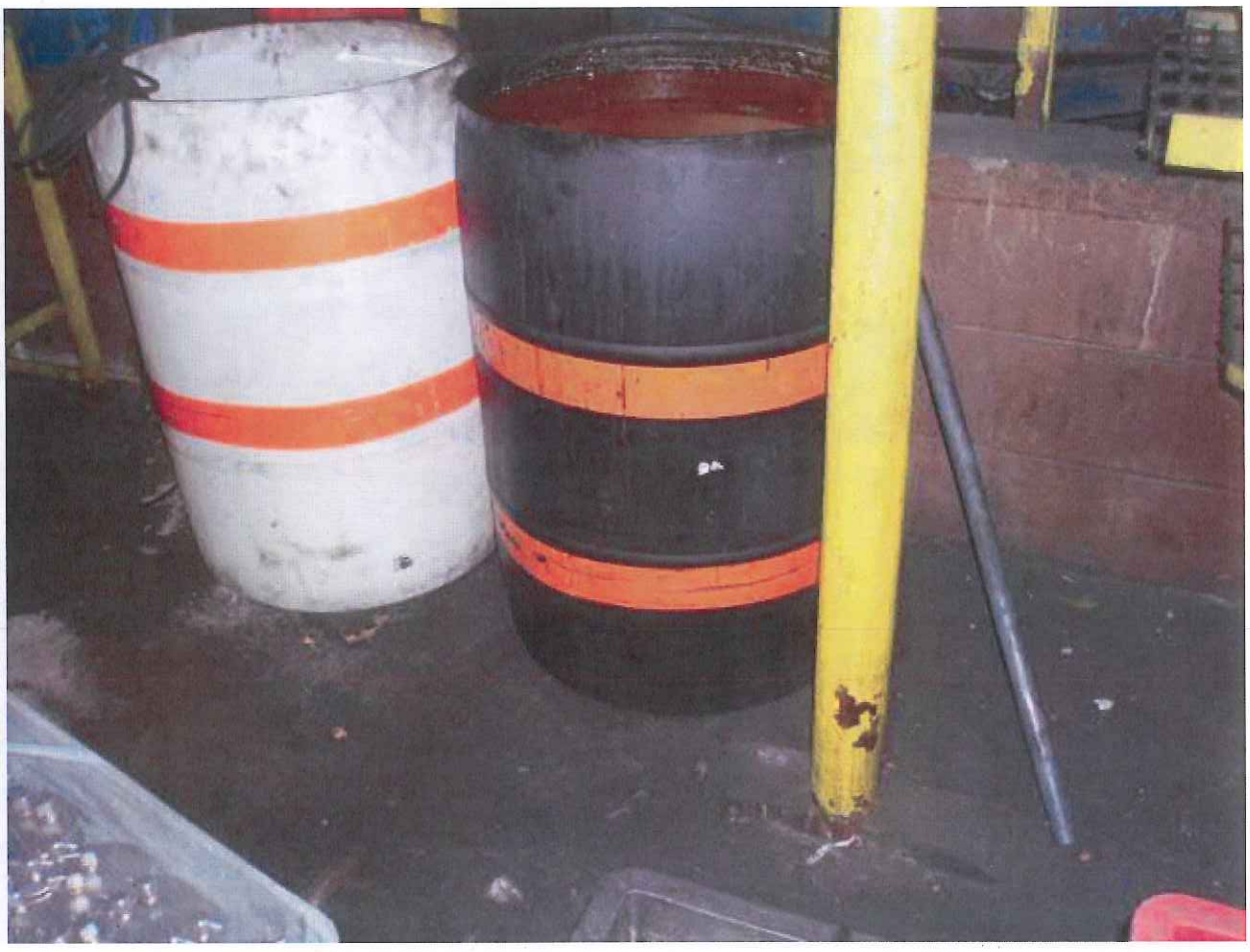
Documents received during this inspection are as follows:

- copy of manifest # 004650161 FLE (ship date – 1/29/13)
- copies of non-hazardous special waste manifests from 2013 through 2015 (18 total)
- copy of Midwest Analytical Services, Inc., analytical results dated 11/24/09 (waste water treatment filter cake)
- copy of Midwest Analytical Services, Inc., analytical results dated 10/13/09 (waste water treatment filter cake)
- copy of Trace Analytical Laboratories, Inc., analytical results dated 9/24/13 (waste water treatment filter cake)
- copy of waste treatment operator position training record
- copies of annual RCRA hazardous waste management training summaries for years 2013, 2014, and 2015
- copy of a page from the facility's contingency plan (pipe labels/colors legend)
- copy of weekly container and safety inspection log dated 11/13/15

Documents given to Cadillac Plating during this inspection are as follows:

- U.S. EPA Small Business Resources handout (compliance assistance)
- Region 5 and State Pollution Prevention contact handout
- Michigan RETAP handout

A photo log is attached consisting of nine (9) photos taken by U.S. EPA during the inspection.



1. A view, at the Oil Storage Area, of one 55-gallon drum adjacent to the Oil Storage Area. The drum contained used oil cleaner (skimmed off of cleaner tanks) as stated by Mr. Ahmed. The drum was not labeled as "Used Oil."

Cadillac Plating Corporation, Warren, MI
Bryan Gangwisch, U.S. EPA 11/18/15

2. A view, at the Filter Press Area, of a hopper that contained the waste water treatment filter cake that is collected beneath the filter presses. The hoppers did not have any hazardous waste labels or applicable waste codes on them. There was filter cake observed on the ground adjacent to one of the hoppers.

Cadillac Plating Corporation, Warren, MI
Bryan Gangwisch, U.S. EPA 11/18/15

3. A view, outside of the facility, at the Filter Cake Storage Area, of one 20 cubic-yard roll-off box that contained waste water treatment filter cake. There was no hazardous waste label, applicable hazardous waste code, nor an accumulation start date marked on the roll-off box. There was a sign that read "Hazardous Waste" posted above the roll-off area. The roll-off box also was not covered at the time of the inspection. The two hoppers that contained waste water treatment filter cake were dumped into the roll-off during the inspection, but the roll-off was still not covered after the hoppers were dumped into it.

Cadillac Plating Corporation, Warren, MI
Bryan Gangwisch, U.S. EPA 11/18/15

4. Another view, outside of the facility at the Filter Cake Storage Area, of the same (as in photo # 3) 20 cubic-yard roll-off box that contained waste water treatment filter cake.

Cadillac Plating Corporation, Warren, MI
Bryan Gangwisch, U.S. EPA 11/18/15

5. Another view, outside of the facility at the Filter Cake Storage Area, of the same (as in photos # 3 and # 4) 20 cubic-yard roll-off box that contained waste water treatment filter cake. The roll-off box was not covered at the time of the inspection. The two hoppers that contained waste water treatment filter cake were dumped into the roll-off during the inspection, but the roll-off was still not covered after the hoppers were dumped into it.

Cadillac Plating Corporation, Warren, MI
Bryan Gangwisch, U.S. EPA 11/18/15

6. Another view, outside of the facility at the Filter Cake Storage Area, of the same (as in photos # 3, # 4, and # 5) 20 cubic-yard roll-off box that contained waste water treatment filter cake.

Cadillac Plating Corporation, Warren, MI
Bryan Gangwisch, U.S. EPA 11/18/15

7. Another view, outside of the facility at the Filter Cake Storage Area, of the same (as in photos # 3, # 4, # 5, and # 6) 20 cubic-yard roll-off box that contained waste water treatment filter cake.

Cadillac Plating Corporation, Warren, MI
Bryan Gangwisch, U.S. EPA 11/18/15

8. Another view, at the Filter Press Area, of a hopper that contained the waste water treatment filter cake that is collected beneath the filter presses. The hoppers did not have any hazardous waste labels or applicable waste codes on them. There was filter cake observed on the ground adjacent to one of the hoppers.

Cadillac Plating Corporation, Warren, MI
Bryan Gangwisch, U.S. EPA 11/18/15

9. A view, at the Filter Press Area, of the blind containment sump as stated by Mr. Ahmed.

Cadillac Plating Corporation, Warren, MI
Bryan Gangwisch, U.S. EPA 11/18/15

Department of Environmental Quality
CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR
INSPECTION FORM

Facility's Name Cadillac Plating Corporation Part 2 Rules

Date 11/18/15 ID # MID006004457 1994 PA 451

HAZARDOUS WASTE & WASTE #	SOURCE	QUANTITY

WASTE DETERMINATION, DISPOSAL AND STORAGE REQUIREMENTS (RULE 205(2) 40 CFR 261.5)

(NI – Not Inspected, N/A – Not applicable)

		YES	NO	
1. Generator complies w/ waste evaluation requirements of R299.9302 for haz waste? (Rule 205(2)(a):40 CFR 261.5(g)(1)).	261A	[X]	___	NI N/A
2. If the generator accumulates > 1000 kg of HW or 1 kg of acute or severely toxic hazardous (LQG if acute waste > 1 kg) does facility comply w/ special provisions of Part 3 applicable to generators of between 100 kg – 1000 kg of HW in a calendar month for the waste that exceeded the limits? (Rule 205(3):40 CFR 262.5(g)(2))?	261A	[ ]	___	NI (N/A)
3. For HW that does not exceed the limits in #2, does generator either treat or dispose of the HW in an on site facility or ensure delivery to an off-site treatment, storage or disposal facility which: (Rule 205(2)(b):40 CFR 261.5(g)(3)).				
a) is permitted under R299.9502(3), (4) or (5)? (Rule 205(2)(b)(i)).	261A	[ ]	___	NI (N/A)
b) stores, treats or disposes of waste & is in compliance w/ applicable requirements of Part 31, 55 & 115 of Act 451? (Rule 205(2)(b)(ii & iii)).	261A	[ ]	___	NI (N/A)
c) beneficially uses or reuses, or legitimately recycles or reclaims the waste or treats the waste before beneficial use or reuse, reclamation or recycling? (Rule 205(2)((b)(iv)).	261A	[ ]	___	NI (N/A)
d) is an off-site POTW & the waste is in compliance w/ federal, state & local requirements & if shipped by vehicle, the conditions of R299.9503(3)(b) are met?. (Rule 205(2)(b)(v)).	261A	[ ]	___	NI (N/A)
e) is in another state & is permitted under 40 CFR part 270? (Rule 205(2)(b)(vi)).	261A	[ ]	___	NI (N/A)
f) is in another state & is in interim status under 40 CFR Part 270 and 265? (Rule 205(2)(b)(vii))	261A	[ ]	___	NI (N/A)
g) is in another state & authorized to manage hazardous waste by the state under 40 CFR Part 271? (Rule 205(2)(b)(viii)).	261A	[ ]	___	NI (N/A)
h) is in another state & licensed/registered to manage municipal/industrial waste. (Rule 205(2)(b)(ix & x))	261A	[ ]	___	NI (N/A)
i) is universal waste managed in accordance w/ the provisions of R299.9228. (Rule 205(2)(b)(xi)).	261A	[X]	___	NI N/A
4. Hazardous waste accumulation is protected from weather/fire/physical damage or vandals? (Rule 205(2)(c)).	261A	[ ]	___	NI (N/A)
5. Haz. waste accumulated so constituents cannot escape by gravity into the soil, directly or indirectly, into surface/groundwaters, or into drains/sewers and fugitive emissions are not in violation of part 55? (Rule 205(2)(d))).	261A	[ ]	___	NI (N/A)
6. The CESQG states that his hazardous waste went to a facility other than the ones specified above, who stored/accumulated the waste. (*Note facility information in comments section).* Rule 205(4)).	261A	[ ]	___	NI (N/A)

COMMENTS:

Department of Environmental Quality
UNIVERSAL WASTE SMALL QUANTITY HANDLER
(SQH) INSPECTION

Facility Name Cadillac Plating Corporation Part 2 Rules

Date 11/18/15 I.D. # MID006004451 1994 PA 451

SQH may choose to manage the following as universal waste when they accumulate quantities of 5000 kg (11,000 lbs) or less of all these wastes on site: antifreeze; batteries [except lead acid batteries managed per R 299.9804]; consumer electronics (devices containing circuit boards, liquid crystal display, or plasma display); electric lamps [fluorescent, high intensity discharge (HID), sodium vapor, mercury vapor, neon, metal halide, incandescent lamps, and cathode ray tubes (CRTs) from computers, televisions, etc.]; mercury items: thermostats, mercury switches, mercury thermometers, waste devices containing only elemental mercury; various pesticides; pharmaceuticals.

Yes/No responses that are outside of the parenthesis are violations.

(NI - Not Inspected N/A - Not Applicable)

PROHIBITIONS (Rule 228(4): 40 CFR 273.11)		YES NO
1. Does SQH dispose of universal waste? (Rule 228(4): 40 CFR 273.11(a))	273.B	[ ] [X] NI N/A
2. Does SQH dilute or treat universal waste, except responding to releases or managing certain waste when included below? (Rule 228(4): 40 CFR 273.11(b))	273.B	[ ] [X] NI N/A

WASTE MANAGEMENT (Rule 228(4): 40 CFR 273.13, 273.14)

ANTIFREEZE: (Rule 228(4))		QTY HANDLED: ____
3. Is antifreeze managed in manner to prevent release by containing it in structurally sound packaging that is compatible w/ contents, & kept closed? Are transport vehicles & vessels managed in the same way? (Rule 228(4)(h))	273.B	[ ] NI N/A
4. Do containers show evidence of leakage, spillage, or damage? If so, are these containers over packed in a container that meets requirements? (Rule 228(4)(h)(ii)(B))	273.B	[ ] NI N/A
5. If tanks are used to store antifreeze, do they meet requirements in 40 CFR 265 Subpart J except 265.197(c), 265.200, & 265.201? (Rule 228(4) (h) (ii) (C). **[USE TANK CHECKLIST]**	273.B	[ ] NI N/A
6. Are containers labeled "UNIVERSAL WASTE ANTIFREEZE" or "WASTE ANTIFREEZE" or "USED ANTIFREEZE"? (Rule 228(4)(h)(iv))	273.B	[ ] NI N/A
7. If a release occurred, was it immediately cleaned up & properly characterized for disposal? (Rule 228(4)(e)(ii))	273.B	[ ] NI N/A

BATTERIES: (Rule 228(4) adopts 40 CFR 273 except 273.10 &273.18(h) requirements)		QTY HANDLED: ____
8. Are batteries managed in way to prevent releases? (Rule 228(4)(a): 40 CFR 273.13(a)	273.B	[ ] NI N/A
9. Are batteries that show evidence of leakage, spillage, or damage that could cause leaks put in containers that are kept closed, structurally sound, compatible w/ contents of battery, & lack evidence of leakage, spillage or damage that could cause leakage? (Rule 228(4): 40 CFR 273.13(a)(1))	273.B	[ ] NI N/A
10. Does the handler do any of the following activities w/ batteries as long as the casings of each battery is not breached & remain intact & closed (except to remove electrolyte): sort by type, mix types in container, discharge to remove electric charge, regenerate, disassemble into individual batteries or cells, remove from consumer products, or remove electrolyte? (Rule 228(4)(a): 40 CFR 273.13(a)(2))	273.B	[ ] NI N/A
11. If electrolyte is removed or other wastes generated from activities in item 10, has it been determined whether it is hazardous waste? (Rule 228(4)(a): 40 CFR 273.13(a)(3))	273.B	[ ] NI N/A
a. If electrolyte or other waste is hazardous waste, is it managed in compliance with Parts 260-272 and Part 111? (Rule 228(4)(a): 40 CFR 273.13(a)(3))	273.B	[ ] NI N/A
b. If electrolyte or other waste is not hazardous waste, is it managed in compliance with Parts 31, 115 or 121 of 451 & local requirements? (Rule 228(4)(a): 40 CFR 273.13(a)(3))	273.B	[ ] NI N/A
12. Are batteries or container(s) of batteries labeled w/ either: "UNIVERSAL WASTE-BATTERIES" or "WASTE BATTERIES" or "USED BATTERIES". (Rule 228(4)(a): 40 CFR 273.14(a))	273.B	[ ] NI N/A

None observed during inspection

CONSUMER ELECTRONICS: (Rule 228(4))		QTY HANDLED: ____
13. Are electronics managed in a manner that prevents breakage or the release of any universal waste or components of universal waste by containing electronics in packaging that will prevent breakage during normal handling conditions? (Rule 228(4)(f)(i))	273.B	[ ] NI N/A
14. Is packaging in which the electronics are contained labeled either "UNIVERSAL WASTE CONSUMER ELECTRONICS" or "UNIVERSAL WASTE ELECTRONICS"? (Rule 228(4)(f)(ii))	273.B	[ ] NI N/A
15. Have releases been properly contained, & have residues been characterized, & properly disposed? (Rule 228(4)(f)(iii)	273.B	[ ] NI N/A
16. Does handler do anything beyond any of the following: repair electronics for direct reuse(Rule 228(4)(g)(i); remove other univ. wastes from cons. electronics (Rule 228(4)((g)(ii)); remove modular components for reuse (Rule 228(4)(g)(iii)	273.B	[ ] NI N/A

ELECTRIC LAMPS: (Rule 228(4) ;273.13(c);273.14(d) **QTY HANDLED:** _____

17. Are lamps crushed or broken and facility trying to manage as universal waste? **(universal waste electric lamps shall not be crushed or broken under MI rule)** (Rule 228(4)(c)(i)) ***Note: different from EPA regulation***	273.B	___ [X] NI N/A
18. Are lamps managed in a manner to prevent breakage or the release of any universal waste or components of universal waste by containing unbroken lamps in structurally sound packaging that is compatible with contents of lamps and will prevent breakage, and packaging kept closed? (Rule 228(4(c)(ii))	273.B	[X] ___ NI N/A
19. Are lamps or packaging containing lamps labeled either "UNIVERSAL WASTE ELECTRIC LAMP(S)" or "WASTE ELECTRIC LAMP(s)" or "USED ELECTRIC LAMP(s)". (Rule 228(4)(c)(iv)) ***Note: different from EPA regulation***	273.B	[X] ___ NI N/A
20. Are lamp fragments or residues, & all lamps that show evidence of breakage, leakage, or damage that could cause release of mercury or other hazardous constituents to the environment immediately contained in packaging that is structurally sound & compatible w/ content, & kept closed? (Rule 228(4)(c)(iii)) ***Note: different from EPA regulation***	273.B	[ ] ___ NI (N/A)
21. If lamp fragments or residues are generated, has it been determined whether it is hazardous waste? (Rule 228(4)(c)(iii (B)) ***Note: different from EPA regulation which allows broken lamps to continue to be managed as universal waste***	273.B	[ ] ___ NI (N/A)
a. If waste is characteristic is it managed in compliance w/ Part 111, Act 451: 40 CFR Part 260-272?	273.B	[ ] ___ NI (N/A)
b. If waste is not characteristic is it managed in compliance w/ Part 115 of Act 451?	273.B	[ ] ___ NI (N/A)

MERCURY DEVICES: (Rule 228(4) ; 40 CFR 273.13 & 273.14 **QTY HANDLED:** _____

22. Are devices managed to prevent releases? (Rule 228 (4)(d): 40 CFR 273.13(c))	273.B	[ ] ___ NI (N/A)
23. Are mercury devices that show evidence of leakage, spillage, or damage that could cause leaks placed in a container that is closed, structurally sound, compatible w/ contents of device, & lack evidence of leakage, spillage or damage that could cause leakage, & designed to prevent the escape of mercury by volatilization or other means? (Rule 228 (4)(d): 40 CFR 273.13(c)(1))	273.B	[ ] ___ NI (N/A)
24. Are mercury devices or containers of mercury devices labeled either "UNIVERSAL WASTE THERMOSTAT(S) " or "WASTE MERCURY THERMOSTAT(S)" or "USED MERCURY THERMOSTAT(S)".(Rule 228 (4)(d): 40 CFR 273.14(d))	273.B	[ ] ___ NI (N/A)
25. Does handler removing ampules meet the following conditions?		
a. Does facility try to prevent breakage and is doing removal only over a containment device? (Rule 228 (4)(d): 40 CFR 273.13(c)(2)(i & ii))	273.B	[ ] ___ NI (N/A)
b. Does facility have a clean-up system available to transfer spilled material to another container & use it immediately w/ broken or leaking ampules? (Rule 228 (4)(d): 40 CFR 273.13(c)(2)(iii & iv))	273.B	[ ] ___ NI (N/A)
c. Is facility area well ventilated & monitored to ensure compliance w/ OSHA exposure limits? (Rule 228 (4)(d): 40 CFR 273.13(c)(2) (v))	273.B	[ ] ___ NI (N/A)
d. Does facility have employees familiar w/ proper waste handling & emergency procedures? (Rule 228 (4)(d): 40 CFR 273.13(c)(2)(vi))	273.B	[ ] ___ NI (N/A)
e. Are removed ampules stored in closed, non-leaking container that is in good condition? (Rule 228 (4)(d): 40 CFR 273.13(c)(2)(vi))	273.B	[ ] ___ NI (N/A)
f. Are removed ampules packed in container with packing material to prevent breakage? (Rule 228 (4)(d): 40 CFR 273.13(c)(2)(vii))	273.B	[ ] ___ NI (N/A)
26. When devices do not contain ampules & handler removes original housings that hold mercury, does handler immediately seal original housing to prevent mercury release & follow all ampule management requirements? (Rule 228 (4)(d): 40 CFR 273.13(c)(3))	273.B	[ ] ___ NI (N/A)
27. If waste is generated from removal of ampules or housings, or if clean-up residues are generated, is it determined if it is hazardous waste? (Rule 228 (4)(d): 40 CFR 273.13(c)(3)(i))(A&B), 273.13(c)(4)(i)	273.B	[ ] ___ NI (N/A)
a. If waste is characteristic, is it managed in compliance w/ part 260-272 and Part 111? (Rule 228 (4)(d): 40 CFR 273.13(c)(4)(ii))	273.B	[ ] ___ NI (N/A)
b. If waste is not hazardous waste, is it managed in compliance w/ Parts 115 & 121 of Act 451, as applicable? Rule 228 (4)(d): 40 CFR 273.13(c)(4)(iii))	273.B	[ ] ___ NI (N/A)

PESTICIDES: Rule 228(4) adopts 40 CFR 273 except 273.10 & 273.18(h) **QTY HANDLED:** _____

28. Handler prevents releases by containing pesticides in containers that are closed, structurally sound & compatible w/ pesticide, & does not show evidence of leakage, spillage or damage? (Rule 228(4)(a): 40 CFR 273.13(b)(1))	273.B	[ ] ___ NI (N/A)
29. If original container is in poor condition, is it over-packed in acceptable container? (Rule 228(4)(a): 40 CFR 273.13(b)(2))	273.B	[ ] ___ NI (N/A)
30. If stored in tank, are requirements of 40 CFR Part 265, Subpart J met except 265.197(c), 265.200, & 265.201? **[USE TANK CHECKLIST]** (Rule 228(4)(a): 40 CFR 273.13(b)(3))	273.B	[ ] ___ NI (N/A)
31. If stored in transport vehicle or vessel, is it closed, structurally sound & compatible w/ pesticides & shows no evidence of leakage, spillage or damage?? (Rule 228(4)(a): 40 CFR 273.13(b)(4))	273.B	[ ] ___ NI (N/A)
32. Are pesticides in a container, tank or transport vehicle labeled either "UNIVERSAL WASTE-PESTICIDE(s)" or "WASTE-PESTICIDE(s)" (Rule 228(4)(a): 40 CFR 273.14(b) **[See 273.14(c) if 273.14(b) not possible]**	273.B	[ ] ___ NI (N/A)

PHARMACEUTICALS: (Rule 228(4) **QTY HANDLED:** _____

33. Are pharmaceuticals managed in a manner to prevent release of any universal waste or components of universal waste by containing pharmaceuticals in structurally sound packaging that is compatible w/ contents & will prevent breakage, & kept closed? Are containers that do not meet these conditions over packed in a container that does? (Rule 228(4)(e)(i))	273.B	[ ] ___ NI (N/A)
34. Does handler disassemble packaging & sort pharmaceuticals? (Rule 228(4)(e)(iii))	273.B	[ ] ___ NI (N/A)

35. Are incompatible pharmaceuticals segregated & adequate distance maintained to prevent contact w/ incompatible materials? (Rule 228(4)(e)(iv)	273.B	[ ] NI N/A
36. If a release occurred, was it immediately cleaned up and properly characterized for disposal? (Rule 228(4) (e) (ii))?	273.B	[ ] NI N/A

ACCUMULATION TIME LIMITS (Rule 228(4): 40 CFR 273.15)

37. Is universal waste accumulated one year or less? (Rule 228(4)(a): 40 CFR 273.15(a)) (if no go to question 38)	273.B	[X] NI N/A
38. If accumulated over one year, is accumulation necessary to facilitate proper recovery, treatment or disposal? (burden on handler to demonstrate) (Rule 228(4)(a): 40 CFR 273.15(b))	273.B	[ ] NI N/A
39. Is length of time universal wastes stored documented by one of the following:		
a. container marked or labeled w/ earliest date when universal waste became a waste? (Rule 228(4)(a): 40 CFR 273.15(c)(1))	273.B	[X] NI N/A
b. individual items of universal waste marked or labeled w/ earliest date it became a waste?? (Rule 228(4)(a): 40 CFR: 273.15(c)(2))	273.B	[ ] X NI N/A
c. inventory system maintained on-site that identifies date each item became a universal waste? (Rule 228(4)(a): 40 CFR 273.15(c)(3))	273.B	[ ] X NI N/A
d. inventory system maintained on-site that identifies earliest date items in a group or group of containers became a universal waste? (Rule 228(4)(a): 40 CFR (273.15(c)(4))	273.B	[ ] X NI N/A
e. universal waste placed in a specific accumulation area & the earliest date is identified when waste was first put in area or date received? (Rule 228(4)(a): 40 CFR (273.15(c)(5))	273.B	[X] NI N/A
f. any other method when demonstrates length of time universal waste accumulated & date it became a waste or received? (Rule 228(4)(a): 40 CFR (273.15(c)(6))	273.B	[ ] X NI N/A

EMPLOYEE TRAINING (Rule 228(4): 40 CFR 273.16)

40. Are employees familiar w/ universal waste handling/emergency procedures, relative to their responsibilities? (Rule 228(4): 40 CFR 273.16))	273.B	[X] NI N/A

RESPONSE TO RELEASE (Rule 228(4): 40 CFR 273.17)

41. Are releases of universal waste & other residue immediately contained? (Rule 228(4): 40 CFR 273.17(a))	273.B	[ ] NI N/A
42. Is material from release characterized? (Rule 228(4): 40 CFR 273.17(b))	273.B	[ ] NI N/A
43. If released material is hazardous waste is it managed as required under Parts 260 – 271 and Part 111? (Rule 228(4): 40 CFR 273.17(b))	273.B	[ ] NI N/A

OFF-SITE SHIPMENTS (Rule 228(4): 40 CFR 273.18

44. Is waste sent to another handler, destination facility or foreign destination? (Rule 228(4)(a): 273.18(a))	273.B	[X] NI N/A
45. If the SQH self-transports waste, does it comply with the universal waste transporter requirements? (Rule 228(4)(b)	273.B	[ ] NI N/A
46. If waste is a USDOT hazardous material, are USDOT requirements met w/regard to package/labels/ marking/placards/shipping papers? (Rule 228(4)(a): 273.18(c))	273.B	[X] NI N/A
47. Prior to shipping universal waste off-site did receiver agree to receive shipment? (Rule 228(4)(a): 40CFR 273.18(d))	273.B	[X] NI N/A
48. If universal waste shipped off-site is rejected by other handler or destination facility, did originating handler either:		
a. receive the waste back? (Rule 228(4)(a): 40 CFR 273.18(e)(1))	273.B	[ ] NI N/A
b. agree to where shipment will be sent? (Rule 228(4)(a): 40 CFR 273.18(e)(2)	273.B	[ ] NI N/A
49. If handler rejects part or full load from another handler, did receiving handler contact originating handler & discuss either:		
a. sending the waste back to originating handler? : (Rule 228(4)(a): 40 CFR 273.18(f)(1)) **OR**	273.B	[ ] NI N/A
b. agreeing to where shipment will be sent? (Rule 228(4)(a): 40 CFR 273.18(f)(2))	273.B	[ ] NI N/A
50. If handler received shipment of hazardous waste that is not universal waste, was the WHMD District Supervisor or designee immediately notified? (Rule 228(4)(a)):40 CFR 273.18(g))	273.B	[ ] NI N/A
51. If handler received a shipment of non-hazardous, non-universal waste, was the waste managed in accordance w/ applicable waste regulations (e.g. solid, liquid industrial, or medical waste)? (Rule 228(4)(a): 40 CFR 273.18(h))	273.B	[ ] NI N/A

EXPORTS (Rule 228(4): 40 CFR 273.20)

52. If waste is sent to a foreign destination does handler:		
a. comply with primary exporter requirements in 40 CFR 262.53, 262.56(a)(1-4 &6) and(b) and 262.57? (Rule 228(4): 40 CFR 273.20(a))	273.B	[ ] NI N/A
b. export with consent of receiving country and in compliance with Acknowledgment of Consent, Subpart E, 40 CFR 262? (Rule 228(4): 40 CFR 273.20(b))	273.B	[ ] NI N/A
c. provide copy of EPA Acknowledgement of Consent to transporter? (Rule 228(4): 40 CFR 273.20(c))	273.B	[ ] NI N/A

TRANSPORTER (Rule 228(6): 40 CFR 273 subpart D except 273.50, 53)

53. Does transporter dispose of universal waste? (Rule 228(6): 40 CFR 273.51(a))	273.D	___ [ ] NI N/A
54. Does transporter dilute or treat universal waste, except if responding to releases? (Rule 228(6): 40 CFR 273.51(b))	273.D	___ [ ] NI N/A
55. If transporting responds to release, do they immediately contain it and characterize residue? If hazardous waste, does transporter meet requirements in 40 CFR 262? (Rule 228(6): 40 CFR 273.54))	273.D	[ ] ___ NI N/A
56. If universal waste stored at transfer facility over 10 days, does transporter meet applicable handler requirements? (Rule 228(6): 40 CFR 273.54))	273.D	[ ] ___ NI N/A
57. Does transporter comply w/ USDOT requirements for package/labels/marking/placards/shipping papers if universal waste is also hazardous material? ***Shipping papers cannot describe universal waste as "hazardous waste, (l) or (s), n.o.s." nor have waste added to USDOT proper shipping name.*** (Rule 228(6)(a): 40 CFR 273.52 and 273.55(b))	273.D	[ ] ___ NI N/A
58. Does transporter meet export conditions contained in 273.56 (dependent on which country will receive shipment)? (Rule 228(6): 40 CFR 273.56)	273.D	[ ] ___ NI N/A
a. has a copy of EPA Acknowledgement of Consent with shipment? (Rule 228(6): 40 CFR 273.56(a)	273.D	[ ] ___ NI N/A
b. delivers shipment to facility designated by person initiating the shipment? (Rule 228(6): 40 CFR 273.56(b))	273.D	[ ] ___ NI N/A

COMMENTS:

DEQ

Department of Environmental Quality, Waste and Hazardous Materials Division

USED OIL INSPECTION FORM – GENERATORS

Facility's Name Cadillac Plating Corporation Part 8 Rules

Date 11/18/15 ID# MID006004451 1994 PA 451

Note: *Used oil is defined as "any oil which has been refined from crude oil, or any synthetic oil which has been used and as a result of use, is contaminated with physical or chemical impurities." R 299.9109*

APPLICABILITY (Rule 809)

NI – Not Inspected, N/A – Not Applicable		YES	NO
1. Does the facility generate used oil and any of the following materials which are subject to regulation as used oil:		X	
a) mixture of used oil and hazardous waste generated by a CESQG regulated pursuant to Rule 205? (Rule 809(1)(a))	UOA		X
b) material that contains or is otherwise contaminated w/ used oil & is burned for energy recovery? (Rule 809(1)(b))	UOA		X
c) used oil that is drained/removed from materials that contain or contaminated w/ used oil? (Rule 809(1)(c))	UOA	X	
d) mixture of used oil and fuel? (Rule809(1)(d))	UOA		X
e) material which is produced from used oil & is burned for energy recovery? (Rule 80991)(e))	UOA		X
f) used oil that is burned for energy recovery & any fuel produced from used oil by processing, blending or other treatment & exceeds the following: (Rule 809(1(f))			
i) maximum arsenic concentration of 5ppm	UOA		
ii) maximum cadmium concentration of 2ppm	UOA		
iii) maximum chromium concentration of 10ppm	UOA		
iv) maximum lead concentration of 100ppm	UOA		
v) minimum flash point of 100 degrees Fahrenheit	UOA		
vi) maximum total halogen concentration of 4,000ppm	UOA		
g) recycled and a hazardous waste solely because it exhibits a hazardous characteristic? (Rule 809(1)(g))	UOA		
h) used oil contains PCB's at any concentration of 50ppm or less? (May also be subject to 40 CFR Part 761) (Rule 809(2)(l))	UOA		
2. Does the facility generate any of the following which exempts it from regulation as used oil: (may be subject to regulation as a hazardous waste)			
a) mixture of used oil and hazardous waste except as specified in Rule 809(1)(a)? (See question 1.a.) (Rule 809(2)(a))	UOA		
b) used oil including metalworking oils/fluids containing chlorinated paraffin w/ > 1000 ppm total halogens which hasn't been successfully rebutted by demonstrating that it does not contain significant concentrations of halogenated hazardous constituents in 40 CFR Part 261, Appendix VIII? (Rule 809(2)(b))	UOA		
c) metalworking oils/fluids w/ chlorinated paraffin reclaimed through a tolling agreement? (Rule 809(2)(b)(i))	UOA		
d) used oil w/ chlorofluorocarbons from refrigeration units going for reclaim? (Rule809(2)(b)(ii))	UOA		
e) material that contains or is otherwise contaminated w/ used oil from which the oil has been removed?(Rule 809 (2)(c))	UOA		
f) mixture of used oil/diesel fuel that is mixed on used oil generator's site & used in their own vehicles? (Rule 809(2)(d))	UOA		
g) used oil & material derived from used oil that are disposed of or used in a manner constituting disposal? (Rule 809(2)(e))	UOA		
h) used oil re-refining distillation bottoms used as feed stock to manufacture asphalt products? (Rule 809(2)(f))	UOA		
i) wastewater, the discharge of which is subject to §402 or §307(b) of the CWA & is contained w/ de minimis quantities of used oil? (Rule 809((2)(g))	UOA		
j) mixture of used oil/crude or natural gas liquid for insertion into a crude oil pipeline? (Rule 809(2)(h))	UOA		
k) mixture of oil/crude or nature gas liquid w/ less than 1% used oil if being stored/transported to crude oil pipeline or petroleum refinery for insertion into process before crude distillation or catalytic cracking? (Rule 809(2)(i))	UOA		
l) used oil for insertion into petroleum refining process before crude distillation or catalytic cracking w/out prior mixing if used oil constitutes less than 1% of crude oil feed? (Rule 809 (2)(j))	UOA		
m) used oil, unintentionally introduced, is captured by a hydrocarbon recovery system or wastewater treatment system at a petroleum refinery & inserted into the refining process? (Rule 809(2)(l))	UOA		
n) tank bottoms from stock tanks w/mixture of used/crude oil or nature gas liquids? (Rule 809(2)(m)	UOA		
o) used oil produced on vessels from normal shipboard operations while on-ship? (Rule 809(2)(n))	UOA		
p) specification used oil fuel once the facility demonstrates compliance w/ R 299.9815(3)(b),(c)&(f)? (Rule809(2)(o))	UOA		
q) used oil containing polychlorinated biphenyls at 50 ppm or greater? (Rule 809(2)(p))	UOA		V

GENERATOR REQUIREMENTS (Rule 810)

NOTE: *Used oil generator requirements do not apply to: (1) farmers who generate, in a calendar year, an average of 25gallons per month or less from vehicles or machinery used on the farm, or (2) household do-it-yourselfer*

		YES	NO	
3. Is the used oil stored in units other than containers or tanks? (Rule 810(4)	UOA		[X]	NI N/A
a) in good condition? (40 CFR 279.22(b)(1))	UOA	[X]		NI N/A
b) not leaking (no visible leaks)? (40 CFR 279.22(b)(2))	UOA	[X]		NI N/A
4. Are all containers & above ground tanks storing used oil labeled/marked "Used Oil"? (40 CFR 279.22(c)(1))	UOA		X	NI N/A
5. Are fill pipes used to transfer used oil into underground tanks labeled/marked "Used Oil"? (40 CFR 279.22(c)(2))	UOA			NI N/A
6. Upon detection of a release does the facility:				
a) stop the release? (40 CFR 279.22(d)(1))	UOA			NI N/A
b) contain the released used oil? (40 CFR 279.22(d)(2))	UOA			NI N/A
c) clean-up and manage the released used oil & other material? (40 CFR 279.22(d)(3))	UOA			NI N/A
d) if necessary to prevent future release, repair/replace any leaking oil containers or tanks? (40 CFR 279.22(d)(4))	UOA			NI N/A

GENERATOR REQUIREMENTS FOR ON-SITE BURNING IN SPACE HEATER
(Rule 810 refers to 40 CFR 279.23)

7. Does facility that burns used oil in oil-fired space heater(s):				
a) burn only used oil generated by the owner/operator or from household do-it-yourselfers? (40 CFR 279.23(a))	UOA			NI N/A
b) burn in heaters designed to have a maximum capacity of not more than 0.5 million BTU per hour?(40 CFR 279.23(b))	UOA			NI N/A
c) have combustion gases vented to the ambient air? (40 CFR 279.23(c))	UOA			NI N/A

GENERATOR REQUIREMENTS FOR OFF-SITE SHIPMENTS OF USED OIL
(Rule 810 refers to 40 CFR 279.24)

8. Does the facility use a transporter with an EPA identification number? (Rule 810 refers to 40 CFR 279.24)	UOA	[X]		NI N/A

OR

9. If the facility does not use a transporter w/ an EPA identification number, does it meet one of the following exemptions?				
a) self transportation of small amounts to approved collection centers provided that the generator transports:				
i) the used oil in a vehicle owned by the generator or an employee of the generator? (40 CFR 279.24(a)(1))	UOA			NI N/A
ii) no more than 55 gallons of used oil at one time? (40 CFR 279.24(a)(2))	UOA			NI N/A
iii) to a used oil collection center that is registered, licensed, permitted or recognized by government? (40 CFR 279.24(a)(3))	UOA			NI N/A
b) self transportation of small amounts to aggregation point owned by the generator provided that the generator transports: (40 CFR 279.24(b))				
i) the used oil in a vehicle owned by the generator or an employee of the generator? (40 CFR 279.24(b)(1))	UOA			NI N/A
ii) no more than 55 gallons of used oil at one time? (40 CFR 279.24(b)(2))	UOA			NI N/A
iii) the used oil to a used oil aggregation point that is owned/operated by the same generator? (40 CFR 279.24(b)(3))	UOA			NI N/A
c) used oil is reclaimed and the processor returns the oil to the generator under tolling for use as lubricant, cutting oil, or coolant? (40 CFR 279.24(c))	UOA			NI N/A
i) the contract indicates the type and amount of used oil and frequency? (40 CFR 279.24(c)(10))	UOA			NI N/A
ii) the contract indicates the vehicle used to transport both ways is owned by the processor? (40 CFR 279.24(c)(2))	UOA			NI N/A
iii) the contract indicates the oil will be returned to the generator? (40 CFR 279.24(c)(3))	UOA			NI N/A

USED OIL DISPOSAL (Rule 816)

10. Is used oil that cannot be recycled & is being disposed of & is not a hazardous waste managed in accordance w/ applicable federal & state regulations? (Rule 816(2))	UOA			NI N/A
11. Is the used oil used as a dust suppressant? (Rule 816(3))	UOA		[X]	NI N/A

COMMENTS:-